

**From:** Joan peters petersjoan@bellsouth.net

**Subject:** Re: Exhibits to Jane Doe's Declaration

**Date:** May 5, 2025 at 1:53 PM

**To:** Andrew Brettler abrettler@berkbrettler.com

**Cc:** Carlos A. Garcia Perez cgarcia@smgqlaw.com, Gustavo D. Lage GLage@smgqlaw.com, Robert "Bob" L. Raskopf Rraskopf@bilzin.com, Patricia M. Patino ppertino@bilzin.com, Jake Camara jcamara@berkbrettler.com, Joel Sichel jsichel@berkbrettler.com, Kai Alblinger kalblinger@berkbrettler.com

JP

Mr. Brettler:

Note that Local Rule 5.4(b)(1) provides, in relevant part, "If, prior to the issuance of a ruling on the motion to file under seal, the moving party *elects* or is required to publicly file a pleading, motion, memorandum, or other document that attaches or reveals the content of the proposed sealed material, then the moving party must redact from the public filing all content that is the subject of the motion to file under seal." Plaintiff elected to attach the declarations to the Reply, and file a simultaneous motion to file under seal. Defendant has no right to receive the unredacted documents at this time. It would also be highly negligent if we were to provide to your client the unredacted documents without the protection of their identities by the Court in light of your client's public statements over the weekend maligning these declarants. Your client has also threatened physical harm to other individuals that have spoken out against him and in support of the Plaintiff: "For Jstlk and Kuihman I'd kill them if I could. I'd show up to their fucking house and do it...I do want someone to kill JSTLK though, or Lav, or Mr.Girl or Kuihman. All those people can go die."

Moreover, you have the full unredacted substantive content of the declarations — the only redacted portions are those that would reveal the identities of these declarants. There can be no legitimate urgency for you, or your client, to know these witnesses' legal identities— that does not alter the facts, or your ability to defend your client in these proceedings.

For these, and other additional reasons, we will not be providing the unredacted documents unless they are under seal. We consider our meet and confer efforts to have been exhausted.

Regards,  
Joan

On May 5, 2025, at 2:47 PM, Andrew Brettler <[abrettler@berkbrettler.com](mailto:abrettler@berkbrettler.com)> wrote:

Counsel:

Despite our repeated requests, you have failed and/or refused to provide us with unredacted copies of the declarations you improperly filed with your reply papers on Friday. Your continued failure and/or refusal to provide the requested documents violates Local Rule 5.4. If you do not immediately provide us with the unredacted filings, we will so advise the Court and seek appropriate remedies, including, but not limited to striking the pleadings relying on the unauthorized declarations and the imposition of judicial sanctions against you and your client.

All rights reserved.

Sincerely,

**Andrew B. Brettler** | BERK BRETTLER LLP  
9119 Sunset Blvd. | West Hollywood, CA 90069  
O: +1.310.278.2111 | M: +1.917.620.2726

On May 3, 2025, at 11:24 AM, Andrew Brettler <[abrettler@berkbrettler.com](mailto:abrettler@berkbrettler.com)> wrote:

And if the Court doesn't grant your motion? Their identifies remain anonymous?

**Andrew B. Brettler** | BERK BRETTLER LLP  
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On May 3, 2025, at 11:23 AM, Carlos Garcia Perez <[cgarciaperez@smgglaw.com](mailto:cgarciaperez@smgglaw.com)> wrote:

To be clear, because of your client's statements related to Jane Doe and any potential witnesses, we had to file these under seal. Once the court rules on the motion, we will proceed accordingly. If the court grants the motion you will know their identities. Thank you.

**CARLOS A. GARCIA PEREZ, ESQ.**

*image001.jpg*

**201 Alhambra Circle, Suite 1205, Miami, FL 33134**

**Office:**

**305.377.1000 Ext. 145**

On May 3, 2025, at 12:37 PM, Andrew Brettler <[abrettler@berkbrettler.com](mailto:abrettler@berkbrettler.com)> wrote:

**SECURITY NOTE:** \*This email has originated from OUTSIDE of SMGQ Law. Please exercise caution with attachments and links \*

Without the Court ruling on your motion to seal, you filed redacted declarations. Please send me the unredacted versions.

In his belated meet and confer email to me, your co-counsel represented, "The documents to be filed under seal are certain statements by witnesses which purpose is keep their names out of the public. You and your client will know their identities." We do not. Please provide that information. Thank you.

**Andrew B. Brettler** | BERK BRETTLER LLP  
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On May 3, 2025, at 9:26 AM, Joan peters <[petersjoan@bellsouth.net](mailto:petersjoan@bellsouth.net)> wrote:

Upon the ruling of the Court on our motion to file the unredacted exhibits under seal (Dkt. 48) we will proceed to file the unredacted versions with the court, at which point you can access them.

I would appreciate a response to my email dated April 28, 2025 regarding the Discord subpoena.

On May 3, 2025, at 10:01 AM, Andrew Brettler <[abrettler@berkbrettler.com](mailto:abrettler@berkbrettler.com)> wrote:

Please provide us with unreacted copies of your filings immediately.

**Andrew B. Brettler** | BERK BRETTLER LLP  
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On May 2, 2025, at 9:11 PM, Carlos Garcia Perez <[cgarciaperez@smgglaw.com](mailto:cgarciaperez@smgglaw.com)> wrote:

Good evening we are having a lot of trouble uploading some of the exhibits. We tried for a couple of hours without success with some of them. Attached is the full

tried for a couple of hours without success with some of them. Attached is the full set of exhibits to Plaintiffs Jane Doe Declaration that will be eventually uploaded. We apologize for the inconvenience and will try to solve the issue over the weekend or as soon as we get some guidance from Pacer. Thank you

**Carlos A. Garcia Perez**  
**Partner**

<image001.jpg>

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**From:** Andrea Garcia <[agarciaw2@gmail.com](mailto:agarciaw2@gmail.com)>

**Date:** Saturday, May 3, 2025 at 12:04 AM

**To:** Carlos Garcia Perez <[cgarciaperez@smgqlaw.com](mailto:cgarciaperez@smgqlaw.com)>

**Subject:** Exhibits to Jane Doe's Declaration

SECURITY NOTE: \*This email has originated from OUTSIDE of SMGQ Law. Please exercise caution with attachments and links \*

<Exhibit A.pdf><Exhibit B.pdf><Exhibit D.pdf><Exhibit G.pdf><Exhibit E.pdf><Exhibit C.pdf><Exhibit I.pdf><Exhibit F.pdf>  
<Exhibit H.pdf><Exhibit K.pdf><Exhibit J.pdf>

